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Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 JASON EDWARD THOMAS CARDIFF,
16 Defendant.

EDCR 5:23-cr-00021-JGB

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
VALERIE L. MAKAREWICZ

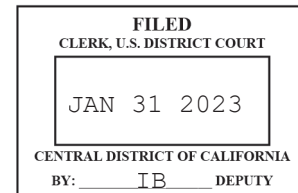
(UNDER SEAL)

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18 The government hereby applies ex parte for an order that the
19 indictment and any related documents in the above-titled case (except
20 the arrest warrants for the charged defendants) be kept under seal
21 until the government files a "Report Commencing Criminal Action" in
22 this matter.

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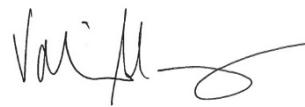
1 This ex parte application is made pursuant to Federal Rule of
2 Criminal Procedure 6(e)(4) and is based on the attached declaration
3 of AUSA Valerie L. Makarewicz.

4 Dated: January 28, 2023

Respectfully submitted,

5 E. MARTIN ESTRADA
6 United States Attorney

7 MACK E. JENKINS
8 Assistant United States Attorney
9 Chief, Criminal Division

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11 VALERIE L. MAKAREWICZ
12 Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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DECLARATION OF VALERIE L. MAKAREWICZ

I, VALERIE L. MAKAREWICZ, declare as follows:

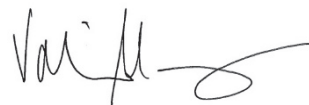
1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. JASON EDWARD THOMAS CARDIFF, No. Enter Case No., the indictment in which is being presented to a federal grand jury in the Central District of California on January 31, 2023.

2. Defendant has not been taken into custody on the charges contained in the indictment and has not been informed that he is being named as a defendant in the indictment to be presented to the grand jury on January 27, 2023. Based on the investigation to date, defendant is currently living in Europe. The likelihood of apprehending defendant might jeopardized if the indictment in this case were made publicly available before defendant is taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter. In addition, the government requests that the indictment and arrest warrant be unsealed only so the government can provide the documents to INTERPOL, so it may post a "Red Notice" regarding defendant, since I believe defendant does not live in the United States at this time.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and

1 that this declaration is executed at Los Angeles, California, on
2 January 28, 2023.

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VALERIE L. MAKAREWICZ
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